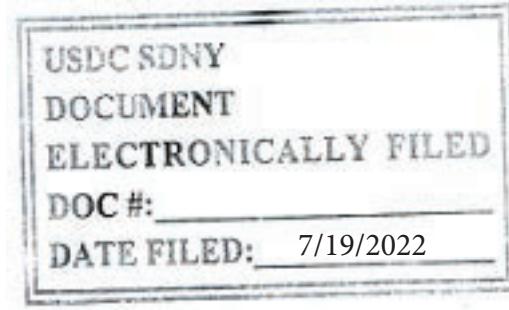


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June 30, 2022

Hon. Nelson Stephen Román
United States Courthouse
300 Quarropas Street
White Plains, NY 10601

**Re: USA v. Alexander Scudder
16 CR 529 (NSR)**

Dear Judge Román:

On behalf of Alexander Scudder, would you kindly accept this letter as a motion for early termination of his Supervised Release? The Government and U.S. Probation were previously notified of this request, and each consents to this application.

HISTORY OF THE CASE

Alexander Scudder was arrested on August 9, 2016, along with several other defendants. The charges were 21 U.S.C. 841 (b)(1)(A) and (b)(1)(B). Mr. Scudder was detained at the arraignment and remained in federal custody until the conclusion of the case. My records show that a guilty plea to 841(b)(1)(C) was entered on or about March 8, 2018. He was in the detention center until his sentence date of September 12, 2018.

The Court pronounced a sentence of Fifty Eight (58) months, with three years of Supervised Release. He was transported to the Bureau of Prisons and served his sentence until January 6, 2020. Mr. Scudder was released to a Halfway House and he was required to wear an ankle bracelet.

On or about July 2, 2020, the ankle bracelet was permitted to be removed by his supervising U.S. Probation Officer.

HISTORY WHILE ON SUPERVISED RELEASE

Upon release from custody, the B.O.P. assigned Alexander Scudder to a Halfway House in Brooklyn, NY. He was able to secure employment in the meat department of Stop & Shop Supermarkets, working in the New City, NY store. He was permitted to reside in his sister's home in Nyack, NY under Halfway House house arrest conditions.

When the ankle bracelet was permitted to be removed, he began to work at Lowe's in the Chester, NY area, as it was close to his residence. At about that time, he enrolled in the culinary school, referred to below, and he had to complete 150 hours in the field of culinary employment to fulfill the requirements of his school. He landed a job at Lego Land in Goshen, NY. The pay was much better, and the work was the type that he had trained for, and the type that he wanted to make for his career. It also helped fulfill the field work requirement. He is currently working for that company in the hotel there. He is a member of a union.

RECENT ACCOMPLISHMENTS

While in custody, Mr. Scudder took the OSHA safety course and received his certificate of completion. He possesses an OSHA card which is valuable in finding employment in certain industries.

In pursuit of his passion, culinary arts, he took online courses from Auguste Escoffier School of Culinary Arts, which is based in Boulder, Colorado. Auguste Escoffier was a world-renowned chef (deceased in 1935) and the school that bears his name is one of the premier culinary schools in the country. Scudder's diploma is in culinary arts and operations.

Using that training, he works at the hotel at LEGOLAND which has 2 large restaurants, serving breakfast, lunch and dinner. The restaurant produces meals of every sort for the guests and diners.

FAMILY SITUATION

When Mr. Scudder was arrested on this case, he and his wife had just started to operate a catering business. This was a second job for them, as each had other employment. But they hoped to be able to make it into their full-time business. Mrs. Scudder is currently working for a real estate office and is also office manager for a dental practice. They hope to be able to fulfill their goal of operating their own business in the future.

The couple has one child together, and they have 4 children from prior relationships. The children are doing well at their respective schools.

OTHER POSITIVE DETAILS

Mr. Scudder and his wife recently rented a venue and did a pop-up brunch. It was advertised online and they had a good turnout, and it was termed a success by the attendees, as well as by Alexander and his wife. This is a small step toward getting back to having their own business in the food industry.

ATTITUDE OF PROBATION AND THE GOVERNMENT

Mr. Scudder's Probation Officer is P.O. Alexander. She is aware of the fact that he will be making this request. By email correspondence to the undersigned, she indicated that her office has no objection to the application.

The Government's position was expressed by AUSA Christopher Clore. On June 30, 2022, Mr. Clore indicated that his office consents to this application.

As the Court can see, there have been no negative incidents during the period of Mr. Scudder's Supervised Release. He has had no arrests, no violations of the supervised release, or anything that would reflect negatively or lead the Court to feel that he was not a candidate for release from the condition of supervision.

Alexander Scudder has served over half of the term of the Supervised Release. It appears that he has made a most positive adjustment to civilian life after his stint at the B.O.P. In the absence of objection from Probation or the Government, it would be reasonable for the Court to grant his application for early termination of the Supervised Release, and he respectfully makes that request.

Thank you for your courtesies, and kindly advise me if anything further is required on my part to assist the Court.

Respectfully,

/s/ Electronically signed

Michael F. Keesee

cc: AUSA Clore via ECF and email
USPO Alexander via email
Alexander Scudder

Defendant's application for early termination of Supervised Release is GRANTED with the Government's consent and without objection by the Probation Office. Clerk of Court is requested to terminate the motion at ECF No. 277.

Dated: White Plains, NY

July 19, 2022

SO ORDERED:

HON. NELSON S. ROMAN

UNITED STATES DISTRICT JUDGE